

# Exhibit 1

**Subject:** Various Discovery Issues  
**Date:** Friday, March 19, 2021 at 12:40:25 PM Eastern Daylight Time  
**From:** Edward Krugman  
**To:** Quinn,Robert E  
**CC:** Claudia Wilner, Darius Charney, Jordan Berger, Chinyere Ezie, Keisha Williams  
**Attachments:** Microsoft Word - Franklin v. Buffalo - Complete List of Search Terms & Custodians, As Applied[13].docx.pdf

Rob

As promised, I am sending two tables that “map” the search terms (new and old) to the custodians (new and old) for whom they should be run. Please let me know of any questions. To be clear (and subject to our ongoing ESI discussion), this map covers both e-mails and non-e-mail ESI.

I look forward to receiving today the two updates from your e-mail of last Friday evening that you said you would have today

- The “method of search” you feel appropriate for non-e-mail ESI, and
- The update on ECAC following your review on independent access to the ECAC files.
- In addition, please include a status report on the metadata spreadsheet; the ongoing absence of that information has significantly affected our ability to review your production efficiently. Your statement that you “will work with the vendor to produce as soon as possible” is not sufficient. You say you have the data; please produce the spreadsheet no later than March 24.

On parking violations, the exemplars you provided were helpful, as is your comment that you cannot search by location of BMHA properties. We will accept Citywide electronic listing of parking tickets limited to tickets for expired inspection or registration tags. Please provide a list of the fields in the PVB database so we can select the ones to be run for the query.

We will have more things to say, but to avoid dribbling things out, we’ll respond to the rest of your e-mail Monday or Tuesday, after we get the two updates promised for today.

EPK

# Black Love Resists in the Rust v. Brown et al., Additional Deponents & Search Terms

## Original Search Terms

Search Term	Includes	Applicable Custodians
1. BMHA	BMHA	
2. housing	housing	Original Custodians, Menza, Wright, Barba, Oakley, Gramaglia, DeGeorge
3. check-point	checkpoint, check point, checkpoints, check points	All Custodians
4. road-block	Roadblock, road block, roadblocks, road blocks	All Custodians
5. impound	impound, impounds, impounded	All Custodians
6. east-side	eastside, east side	Original Custodians, Thomas, Wigdorski, Miller, Acquino, Tedesco, Skipper, Hy, Hassett, Healy, Domaracki, Whiteford, Oakley, Gramaglia, DeGeorge
7. tint	tint, tints, tinted	All Custodians
8. tow	tow, towed	All Custodians
9. discriminat	discriminate, discriminates, discriminated, discriminatory, discrimination	All Custodians
10. rac	race, racial, racist, racism	All Custodians
11. profil	profile, profiled, profiling	All Custodians
12. bias	bias, biased	All Custodians
13. quota	quota, quotas	Original Custodians
14. ticket	ticket, tickets, ticketing	Original Custodians, Macy, Oakley, Gramaglia, DeGeorge, McClellan, Rosenswie
15. traffic-stop	traffic stop, traffic stops	Original Custodians, Thomas, Wigdorski, Miller, Acquino, Tedesco, Skipper, Hy, Hassett,

		Healy, Domaracki, Whiteford, Oakley, Gramaglia, DeGeorge, McClellan, Rosenswie
16. law-suit	lawsuit, law suit, lawsuits, law suits	Original Custodians, Oakley, Gramaglia, DeGeorge
17. strike-force	strikeforce, strike force	Original Custodians, Menza, Wright, Barba, Oakley, Gramaglia, DeGeorge, McClellan, Rosenswie
18. summons	summons, summonses	Original Custodians, Oakley, Gramaglia, DeGeorge, McClellan, Rosenswie
19. revenue	revenue, revenues	All Custodians
20. budget	budget, budgets, budgetary	Original Custodians, Gramaglia

### Additional Search Terms

Term	Includes	Relevant Custodian
1. Road check	Road check, roadcheck, road checks, road check	All Custodians
2. Hot pocket	Hotpocket, hot pocket, hotpockets	Original Custodians, Menza, Wright, Barba, Oakley, Gramaglia, DeGeorge,
3. Hotspot	Hotspot, hot spot, hotspots, hot spots	Original Custodians, Menza, Wright, Barba, Oakley, Gramaglia, DeGeorge
4. BPD-HU	BPD-HU, HU	Brown, Menza, Wright, Barba, Oakley, Gramaglia, DeGeorge, McClellan, Rosenswie
5. SF	SF	Brown, Menza, Wright, Barba, Oakley, Gramaglia, DeGeorge, McClellan, Rosenswie
6. Stop receipt/report	Stop receipt, stop receipts, stop report, stop reports	All Custodians employed with BPD or City of Buffalo as of 1.1.2020
7. High crime	High crime, highcrime	Original Custodians, Oakley, Gramaglia, DeGeorge
8. Violent crime	Violent crime, violent crimes	Original Custodians, Derenda, Oakley, Gramaglia, DeGeorge

9. Erie Crime Analysis Center (ECAC)	Erie Crime Analysis Center, ECAC	Original Custodians, Oakley, McClellan, Rosenswie
10. High visibility	High visibility, visibility	Original Custodians, Oakley, Gramaglia
11. Crackdown	Crackdown, crack down	Original Custodians, Oakley, Gramaglia, DeGeorge, McClellan, Rosenswie
12. Safety-check	Safety check, safety checks	Original Custodians, Oakley, Gramaglia
13. Roadway safety	Roadway safety, roadway-safety	Original Custodians, Oakley, Gramaglia, DeGeorge
14. Traffic safety	Traffic safety, traffic-safety	Brown, Derenda, Lockwood, Serafini, Young, Brinkworth, Oakley, Gramaglia, DeGeorge
15. School/speed zone	School zone, speed zone	All Custodians employed with BPD or City of Buffalo as of 1.1.2020
16. Zero tolerance	Zero tolerance	All Custodians
<b>17. numbers<sup>1</sup></b>	<b>numbers</b>	All Custodians
18. Complain*	Complain, complainant, complained, complaint, complaints, complt	Serafini, Young, Brinkworth, Menza, Wright, Barba, Thomas, Wigdorski, Miller, Acquino, Tedesco, Skipper, Hy, Hassett, Healy, Domaracki, Whiteford
19. Internal Affairs Department (IAD)	Internal affairs, IAD	Original Custodians, Thomas, Wigdorski, Miller, Acquino, Tedesco, Skipper, Hy, Hassett, Healy, Domaracki, Whiteford, , Gramaglia
20. Camera	Camera, cameras	Brown, Menza, Wright, Barba, Oakley, Gramaglia, DeGeorge

---

<sup>1</sup> Replacing the word “publicity.”